

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 22-40(1) (JRT/LIB)(1)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	
)	
HARSHKUMAR PATEL,)	
)	
)	
Defendant.)	
)	

**Defendant Harshkumar Patel's Motion to
For a Downward Variance**

Defendant, HARSHKUMAR PATEL, by and through his attorneys Thomas More Leinenweber and Thomas Plunkett, respectfully moves the Court for an Order granting a downward variance in the sentencing of Mr. Patel from the Advisory Sentencing Guidelines range. Counsel respectfully asks that the Court impose a below guidelines prison sentence.

The request for a variance is based on Mr. Patel's particular circumstances, life history and the factors set forth in 18 U.S.C. § 3553(a). Support for this motion is provided by Defendant Harshkumar Patel's Position on Sentencing.

Respectfully submitted,

Dated: April 18, 2025

/s/ Thomas More Leinenweber

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